

Screening Criteria and Threshold Evidence

This appendix provides context and evidence for the screening criteria and thresholds for the transportation VMT CEQA analysis.

SCREENING CRITERIA

Development projects are presumed to have less than significant impacts to the transportation system, and therefore would not be required to conduct a VMT analysis, if any of the following criteria are established, based on substantial evidence.

Location Based Screening Maps

If a residential development is located in an area where household VMT per capita is less than 85 percent of the regional average, or a commercial employment development is located in an area where VMT per employee is less than 85 percent of the regional average, or an industrial or agricultural employment development is located in an area where the VMT per employee is less than 100 percent of the regional average, the project is presumed to result in a less than significant CEQA impact.

Evidence – This presumption is consistent with the Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) (OPR Technical Advisory), which provides that “residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with data from a travel survey or travel demand model can illustrate areas that are currently below threshold. Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.”

Evidence – Purely industrial or agricultural uses are desired to be located in less VMT efficient, higher VMT areas in the City of San Diego. Placing these land intensive uses in areas with less efficient VMT allows land in efficient VMT areas to be more effectively utilized as high density residential and commercial uses. This threshold will encourage industrial and agricultural uses to

develop in locations appropriate for industrial and agricultural uses, leaving infill and more VMT efficient areas available for more dense uses.

Specifically, the OPR Technical Advisory provides that “of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types.”

Evidence – Although Transit Priority Areas (TPAs) are not screened out, most TPAs (using the RTIP TPA map) in the City of San Diego are located in screened out locations per the screening maps. Additionally, as described in the *City of San Diego Climate Action Plan Consistency Checklist, Technical Support Documentation*, projects located in a TPA can help reduce VMT by increasing capacity for transit-supportive residential and/or employment densities in low VMT areas and by doing so implement the General Plan’s City of Villages strategy and the General Plan’s Mobility Element. The increased density that is associated with projects in a TPA can increase transit ridership and therefore justify enhanced transit service which would in turn increase the amount of destinations that are accessible by transit and further increase transit ridership and decrease VMT.

Small Projects

In addition, small projects, which are whole projects with independent utility that would generate less than 300 average daily vehicle trips (ADT), would also not result in significant VMT impacts on the transportation system:

Evidence – The OPR Technical Advisory states that “projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant impact.” This is supported by the fact that, “CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development, and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301(e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (e.g., general office building, single tenant office building, office park, or business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable

to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.”

The OPR Technical Advisory uses the Institute of Transportation Engineers (ITE) trip generation rates. In San Diego, the trip generation for a small project was determined utilizing the City of San Diego trip generation rates for Commercial Office following the same OPR Technical Advisory rationale. These rates are listed below.

Trip Generation Rate		
Land Use	Unit	
Commercial Office	1,000 square feet (KSF)	City of San Diego Logarithmic Rate $\ln(T) = 0.756 \ln(x) + 3.95$; where T=trips and x=Gross Leasable Area (GLA) in 1,000 square feet.
Trip Generation for 10,000 SF Office		
Commercial Office	10 KSF	296

Using the City of San Diego’s trip generation rates for a 10,000 sf commercial office the daily trip generation is calculated as 296. This number was rounded to develop the 300 daily trip small project definition.

Local Serving Retail

Local Serving Retail is defined in the City of San Diego as retail that is less than 100,000 square feet of total gross floor area and has a market area study that shows a market capture area that is less than three miles and serves a population of roughly 25,000 or less. Local serving retail includes the Neighborhood Shopping Center land uses from the City of San Diego Trip Generation Manual. If

the specific retail business is a regional serving business, City staff may require a VMT analysis. Hotels and motels are not considered local serving retail (such uses are employment uses for CEQA VMT analysis).

Evidence – The OPR Technical Advisory provides that “because new retail development typically redistributes shopping trips rather than creating new trips,¹ estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.” Local serving retail generally shortens trips as longer trips from regional retail are redistributed to new local retail.

Local Serving Public Facilities

Public facilities that serve the community and either produce very low VMT or divert existing trips from established local facilities. A replacement/remodel of an existing local serving public facility with no net increase in VMT would not require a VMT analysis for CEQA.

Evidence – Similar to local serving retail, local serving public facilities would redistribute trips and would not create new trips. Thus, similar to local serving retail, trips are generally shortened as longer trips from a regional facility are redistributed to the local serving public facility.

Affordable Housing Projects

Residents of affordable residential projects typically generate less VMT than residents in market rate residential projects. This pattern is particularly evident in affordable residential projects near transit². In recognition of this effect, and in accordance with the OPR Technical Advisory, deed-restricted affordable housing projects meet the City’s screening criteria and would not require a VMT analysis.

¹ Lovejoy, et al., Measuring the impacts of local land-use policies on vehicle miles of travel: The case of the first big-box store in Davis, California, The Journal of Transport and Land Use, 2013.

² Newmark and Hass, “Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy”, The California Housing Partnership, 2015.

Projects that provide affordable housing affordable to persons with a household income equal to or less than 50 percent of the area median income as defined by California Health and Safety Code Section 50093, housing for senior citizens (as defined in Section 143.0720(e)), housing for transitional foster youth, disabled veterans, or homeless persons (as defined in 143.0720(f)), and that does not provide off-street parking spaces in an amount that exceeds the minimum required parking as set forth in SDMC Chapter 14, Article 2, Division 5 are not required to complete a VMT analysis.

Evidence –Affordable residential projects generate fewer trips than market rate residential projects³. As referenced in SDMC Section 143.0744, parking reductions from the standard parking requirements are applicable for affordable housing. This supports the assumption that the rate of vehicle ownership is expected to be less for persons that qualify for affordable housing. Additionally, senior citizens, transitional foster youth, disabled veterans, and homeless individuals also have low vehicle ownership rates.

Redevelopment Project

A redevelopment project that demonstrates that the total project VMT is less than the existing land use's total VMT is not required to complete a VMT analysis.

Evidence – Consistent with the OPR Technical Advisory, "[w]here a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply."

If a residential or office project leads to a net increase in VMT, then the project's VMT per capita (residential) or per employee (office) should be compared to thresholds recommended above. Per capita and per employee VMT are efficiency metrics, and, as such, apply only to the proposed project without regard to the VMT generated by the previously existing land use.

³ Newmark and Hass, "Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy", The California Housing Partnership (2015).

If the project leads to a net increase in provision of locally-serving retail, transportation impacts from the retail portion of the development should be presumed to be less than significant. If the project consists of regionally-serving retail, and increases overall VMT compared to with existing uses, then the project would lead to a significant transportation impact. – OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

THRESHOLDS

If a project is required to complete a VMT analysis, the project's impacts to the transportation system would be significant if the VMT would exceed any of the thresholds below.

Residential

Threshold – 15% below regional average household VMT/Capita.

Evidence – The OPR Technical Advisory provides that “residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than-significant transportation impact.”

Commercial Employment

Threshold – 15% below regional average VMT/Employee.

Evidence – The OPR Technical Advisory provides that “office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact.”

Industrial and Agricultural Employment

Threshold – At or below regional average VMT/Employee

Evidence – The OPR Technical Advisory provides that “[o]f land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which

may include other land use types.” Purely industrial and agricultural uses are desired to be located in locations that are less dense and not within urban areas which typically have higher VMT per employee. Industrial and agricultural land uses are land intensive; therefore, placing industrial and agricultural land uses in less urban areas characterized by having higher VMT per employee allows land in efficient VMT areas to be more effectively utilized as high density residential and commercial uses. This threshold is consistent with achieving an overall reduction in Citywide VMT as it recognizes that industrial and agricultural uses, which are relatively lower total VMT generating uses are most appropriate in areas that have a lower potential to reduce VMT because it results in more available land within areas with a high potential to achieve VMT reductions available for more dense development.

Regional Retail

Regional retail uses are retail uses that are larger than 100,000 square feet of total gross floor area.

Threshold – A net increase in total regional VMT

Evidence – The OPR Technical Advisory provides that “because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts...Regional-serving retail development,... which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.”

Retail within the City of San Diego will be analyzed consistent with the OPR technical advisory. The City of San Diego has retail uses that attract trips from beyond a neighborhood which are defined in the Land Development Code Trip Generation Manual, Appendix C as “Community Shopping Center,” and “Regional Shopping Center” which are characterized as being greater than 100,000 square feet.